

**IN THE DISTRICT COURT  
FOR THE UNITED STATES OF AMERICA  
WESTERN DISTRICT OF TENNESSEE**

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SCOTT TURNAGE, CORTEZ D. )  
BROWN, DEONTAE TATE, JEREMY S. )  
MELTON, ISSACCA POWELL, KEITH )  
BURGESS, TRAVIS BOYD and TERRENCE )  
DRAIN on behalf of themselves and all )  
similarly situated persons, )

Plaintiffs, )

v. )

BILL OLDHAM, in his individual capacity )  
and in his official capacity as the Sheriff of )  
Shelby County, Tennessee; ROBERT )  
MOORE, in his individual capacity and in )  
his official capacity as the Jail Director of )  
Shelby County, Tennessee; CHARLENE )  
MCGHEE, in her individual capacity and )  
in her official capacity as the Assistant )  
Chief of Jail Security of Shelby County, )  
Tennessee; DEBRA HAMMONS, in her )  
individual capacity and in her official )  
capacity as the Assistant Chief of Jail )  
Programs of Shelby County, Tennessee; )  
SHELBY COUNTY, TENNESSEE, a )  
Tennessee municipality; and TYLER )  
TECHNOLOGIES, INC., a foreign )  
corporation, )

Defendants. )

Civil Action No.  
2:16-cv-02907-SHM-tmp  
Jury Demanded

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**DEFENDANTS BILL OLDHAM, ROBERT MOORE, CHARLENE MCGHEE, DEBRA  
HAMMONS, SHELBY COUNTY, TENNESSEE AND TYLER TECHNOLOGIES, INC.  
JOINT MOTION AND SUPPORTING MEMORANDUM FOR EXTENSION OF TIME  
TO ANSWER OR OTHERWISE RESPOND TO THE PLAINTIFFS' SECOND  
AMENDED CLASS ACTION COMPLAINT**

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The Defendants Bill Oldham, Robert Moore, Charlene McGhee, Debra Hammons, Shelby County, Tennessee (“Shelby County Defendants”) and Tyler Technologies, Inc. (“Tyler”), pursuant to FED. R. CIV. P. 6 and 12 and other applicable provisions of law, moves the Court to extend to May 26, 2017, their time to answer or otherwise respond to Plaintiffs’ Second Amended Class Action Complaint (“Complaint”). (DE 52) In support of their Joint Motion, Defendants state as follows:

MEMORANDUM OF FACTS AND LAW IN SUPPORT OF MOTION

1. Pursuant to the Order Granting Motion to Consolidate Cases (DE 42), Plaintiffs may file a Second Amended Class Action Complaint without leave of Court.
2. Plaintiffs filed a Second Amended Class Action Complaint on May 4, 2017. (DE 52) Pursuant to the Order Granting Motion to Consolidate Cases (DE 42), Defendants have until Thursday, May 18, 2017 to file a responsive pleading.
3. This is a complex class action lawsuit filed on behalf of the plaintiffs. Plaintiffs added a new plaintiff and additional facts and allegations in the Second Amended Class Action Complaint. (DE 52)
4. The Shelby County Defendants and Tyler need additional time to investigate the additional facts and allegations in the Second Amended Class Action Complaint.
5. Pursuant to Local Rule 7.2(a)(1)(B), counsel for Shelby County Defendants, with permission from Bradley Trammell, Counsel for Tyler, consulted with Frank Watson, Plaintiffs’ co-counsel, regarding this extension.
6. Mr. Watson consents to Defendants’ Joint Motion for Extension of Time.

7. This Motion for Extension of Time is not intended to delay the Plaintiffs' lawsuit.

8. A proposed Order granting the Motion for Extension of Time will be e-mailed to the Court for its consideration.

Therefore, the Shelby County Defendants and Tyler respectfully request the Court extend to May 26, 2017 their time to answer or otherwise respond to the Second Amended Class Action Complaint filed by the Plaintiffs.

Respectfully submitted,

/s/Odell Horton, Jr.

Robert E. Craddock, Jr. (# 5826)

Odell Horton, Jr. (# 12426)

Amber D. Floyd (# 29160)

WYATT, TARRANT & COMBS, LLP

1715 Aaron Brenner Drive, Suite 800

Memphis, TN 38120-4367

(901) 537-1000

[ohorton@wyattfirm.com](mailto:ohorton@wyattfirm.com)

E. Lee Whitwell (#33622)

Shelby County Attorney's Office

160 North Main Street, Suite 950

Memphis, TN 38103

(901) 222-2100

[lee.whitwell@shelbycountyttn.gov](mailto:lee.whitwell@shelbycountyttn.gov)

*Attorney for Defendants Bill Oldham, Robert Moore,  
Charlene McGhee, Debra Hammons and Shelby  
County, Tennessee*

/s/ Bradley E. Trammel  
Bradley E. Trammell (#13980)  
BAKER, DONELSON, BEARMAN,  
CALDWELL & BERKOWITZ  
165 Madison Avenue, Suite 2000  
Memphis, Tennessee 38103  
(901) 577-2121  
[btrammel@bakerdonelson.com](mailto:btrammel@bakerdonelson.com)

Beth Bivans Petronio (admitted *pro hac vice*)  
Texas Bar No. 00797664  
K&L GATES, LLP  
1717 Main Street, Suite 2800  
Dallas, Texas 75201  
Telephone: (214) 939-5500  
[beth.petronio@klgates.com](mailto:beth.petronio@klgates.com)

*Attorneys for Tyler Technologies, Inc.*

**CERTIFICATE OF SERVICE**

I certify that the foregoing is being filed via the Court's ECF system this 17<sup>th</sup> day of May, 2017, for service on all persons registered in connection with this case.

/s/Odell Horton, Jr.  
Odell Horton, Jr.